

FILED

JAN 23 2014

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN A. BOYLES, and
ARICA M. BOYLES,

Defendants.

Criminal No.

2:14cr6

Violations:

18 USC §2
21 USC §841(a)(1)
21 USC §841(b)(1)(C)
21 USC §846

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Cocaine Conspiracy)

From on or about March 1, 2013, to on or about March 2, 2013, at or near Kerens, Tucker County, West Virginia, and within the Northern Judicial District of West Virginia, and elsewhere, the defendants, **JOHN A. BOYLES** and **ARICA M. BOYLES** did knowingly and willfully combine, conspire, confederate and agree and have a tacit understanding with each other and with other persons known and unknown to the grand jury, to commit offenses against the United States, that is, to violate Title 21, United States Code, Sections 841(a)(1) and 841(c)(2). It was a

purpose and object of the conspiracy knowingly and intentionally to possess with intent to distribute and to distribute cocaine, also known as "coke," and cocaine base, also known as "crack," a Schedule II drug-controlled substance, as designated by Title 21, United States Code, Section 812(c), Schedule II(a)(4); in violation of Title 21, United States Code, Section 846 and 841(b)(1)(C).

COUNT 2

(Aiding and Abetting the Distribution of Cocaine Base)

On or about March 2, 2013, at approximately 12:24 a.m., at or near Tucker County, West Virginia, within the Northern Judicial District of West Virginia, the defendants **JOHN A. BOYLES and ARICA M. BOYLES**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority distribute a quantity of cocaine base, also known as “crack,” a Schedule II drug controlled substance, to a person known to the grand jury, in exchange for approximately \$1,600.00; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

(Aiding and Abetting the Possession with Intent to Distribute Cocaine Base)

On or about March 2, 2013, at approximately 1:30 a.m., at or near Tucker County, West Virginia, within the Northern Judicial District of West Virginia, the defendants **JOHN A. BOYLES and ARICA M. BOYLES**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a quantity of cocaine base, also known as “crack,” a Schedule II drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 4

(Aiding and Abetting the Possession with Intent to Distribute Cocaine)

On or about March 2, 2013, at approximately 1:30 a.m., at or near Tucker County, West Virginia, within the Northern Judicial District of West Virginia, the defendants **JOHN A. BOYLES and ARICA M. BOYLES**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a quantity of cocaine, a Schedule II drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

A True Bill,

Foreperson

William J. Ihlenfeld, II
United States Attorney

COUNT 4

(Aiding and Abetting the Possession with Intent to Distribute Cocaine)

On or about March 2, 2013, at approximately 1:30 a.m., at or near Tucker County, West Virginia, within the Northern Judicial District of West Virginia, the defendants **JOHN A. BOYLES and ARICA M. BOYLES**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a quantity of cocaine, a Schedule II drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

A true bill,

/s/

Grand Jury Foreperson
(Signature on File)

/s/

WILLIAM J. IHLENFELD, II
United States Attorney